

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

PRESIDENT DONALD J. TRUMP,

Plaintiff

v.

CBS BROADCASTING INC. &  
CBS INTERACTIVE INC.,

Defendants

Case No. 2:24-cv-00236-Z

**AGREED MOTION TO EXTEND TIME TO  
RESPOND TO COMPLAINT**

Defendants CBS Broadcasting Inc. and CBS Interactive Inc. hereby respectfully request that the Court extend the deadline for Defendants to move, answer, or otherwise respond to the Complaint to December 6, 2024. This is Defendants' first request for an extension. Defendants conferred with counsel for Plaintiff Donald J. Trump, who consents to this motion.

As grounds for this motion, Defendants state as follows:

1. Plaintiff filed his Complaint on October 31, 2024. Plaintiff served Defendant CBS Interactive Inc. on November 4, 2024 and Defendant CBS Broadcasting Inc. on November 5, 2024. As a result, Defendant CBS Interactive Inc.'s response to the Complaint is due on November 25, 2024, and CBS Broadcasting, Inc.'s response to the Complaint is due on November 26, 2024.

2. On November 14, 2024, counsel for Plaintiff (Edward Paltzik) and counsel for Defendants (Elizabeth McNamara) met and conferred pursuant to Local Rule 7.1(h) concerning Defendants' request for an extension of time to respond. The parties agreed that the deadline for

both Defendants to answer or move to dismiss shall be extended up to and including December 6, 2024.

3. Good cause exists to extend the deadline to answer or otherwise respond. See Fed. R. Civ. P. 6(b)(1)(A). No previous extensions have been requested or granted, and no party will be prejudiced by the requested extension.

4. Defendants make this motion without prejudice to their right to seek abatement of this matter pursuant to Tex. Bus. & Com. Code § 17.505(a) or to contest the exercise of personal jurisdiction. Plaintiff consents to this motion without prejudice to his right to oppose abatement of this matter or to oppose any efforts by Defendants to contest the exercise of personal jurisdiction.

WHEREFORE Defendants respectfully submit this unopposed Motion asking the Court to extend the deadline for Defendants to move, answer, or otherwise respond to Plaintiff's Complaint to December 6, 2024.

Respectfully submitted,

/s/ Thomas C. Riney

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*Attorneys for CBS Broadcasting Inc. & CBS  
Interactive Inc.*

**CERTIFICATE OF CONFERENCE**

I hereby certify that on November 14, 2024, I conferred with counsel for Plaintiff Donald J. Trump concerning this motion, who stated that he is unopposed to the relief requested in this motion.

/s/ Elizabeth A. McNamara  
Elizabeth A. McNamara

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon all counsel of record on November 19, 2024, via the Court's CM/ECF system.

/s/ Thomas C. Riney  
Thomas C. Riney